

**Subject:** Airplane noise question

**Date:** Saturday, March 30, 2019 at 6:41:49 PM Pacific Daylight Time

**From:** Jane Manning

**To:** Representative Anna G. Eshoo, Andi Jordan, Jane Manning

To: United States Representative Anna Eshoo

Cc: Andi Jordan, Executive Director Cities Association

From: Jane Manning, 16625 Skyline Boulevard, Los Gatos, CA 95033; jmanning65@ymail.com

April 2, 2019

Dear Congresswoman Eshoo,

Like many of our neighbors, my family has been drastically negatively impacted by recent increases in air traffic noise. We have written to airport noise offices, your office and the FAA about the problem. We appreciate your involvement over several years with this issue. It is wonderful that Andi Jordan has worked so hard to coordinate the new Santa Clara/Santa Cruz County Airport-Community Round Table. We are definitely among the people welcoming this process.

My question is about the altitude and speed that planes are allowed to fly. The navigational tracks are published on the FAA's IFP Information Gateway. An example is the BRIXX2 RNAV procedure for arrivals at San Jose from Vancouver, Sea-Tac, Portland and other cities to the north.

What is the significance of minimum altitudes and maximum airspeeds indicated in procedures such as BRIXX2? Is air traffic control obligated to direct pilots to operate within the published values or are they just guidelines? As an example, between the JILNA and YADUT waypoints, the BRIXX2 procedure indicates a minimum pressure-corrected altitude of 7000 feet and a speed of under 250 knots. I understand that there is some leeway for actual altitudes (maybe +/- 1000 feet?). Here are the links to the BRIXX map and published procedure:

[https://www.faa.gov/aero\\_docs/dtpp/1904/00693BRIXX.PDF#nameddest=\(SJC\)](https://www.faa.gov/aero_docs/dtpp/1904/00693BRIXX.PDF#nameddest=(SJC))

[https://www.faa.gov/air\\_traffic/flight\\_info/aeronav/procedures/application/?event=directory&directory=2015010229867904001-SJC-NDBR&type=ndbr&nasrId=SJC](https://www.faa.gov/air_traffic/flight_info/aeronav/procedures/application/?event=directory&directory=2015010229867904001-SJC-NDBR&type=ndbr&nasrId=SJC)

I registered more than 500 BRIXX2 disturbance events on the Report Jet Noise app in the past year. 86% of these were flying lower than 7000' (the published altitude) and 49% were lower than 6000'. Also, 46% were flying faster than procedure. Speed and altitude correlate directly with noise from our experience. Over our home, BRIXX2 overlaps with two other heavily used procedures, SERFR3 and SSTIK (each with ~30% of SFO arrivals and departures respectively per SFO Airport Director's reports). However, BRIXX2 flights are the loudest and lowest, with about 30 per day, going until midnight on most nights.

I appreciate you taking the time to read this letter. Thank you in advance for any clarification you can provide.

Best regards,  
Jane Manning

Mr. Dan Elwell  
Acting Administrator  
Federal Aviation Administration  
800 Independence Ave., SW  
Washington, DC 20091  
Sent via email to [Dan.Elwell@faa.gov](mailto:Dan.Elwell@faa.gov)

**Re: Request for Extension of Comment Period on STAR PIRAT TWO and Comments Regarding STAR PIRAT TWO**

Dear Mr. Elwell,

The City of Palo Alto is writing to express our concerns about the STAR PIRAT TWO procedure proposed for implementation in the northern California airspace. See [https://www.faa.gov/air\\_traffic/flight\\_info/aeronav/procedures/application/?event=procedure.results&tab=coordination&nasId=SFO#searchResultsTop](https://www.faa.gov/air_traffic/flight_info/aeronav/procedures/application/?event=procedure.results&tab=coordination&nasId=SFO#searchResultsTop).

The City recognizes and appreciates that the proposed STAR PIRAT TWO procedure directs aircraft to fly at higher altitudes over a portion of the Peninsula – a practice we have frequently requested and supported. However, the City remains extremely concerned about other potential impacts of this proposed procedure and that the response to our Freedom Of Information Act (FOIA) request regarding procedure has not been completed. Therefore, we write this letter to request an extension of the comment period for the STAR PIRAT TWO procedure and to express our concerns about the procedure.

**Extension of the Comment Period**

The comment period for the proposal is scheduled to close on March 29, 2019. The City has previously submitted comments on the proposal but was not afforded access to the background documentation supporting the proposal including, for example, environmental analysis that would support implementation. As a result, we submitted, through counsel, a FOIA request dated October 29, 2018, for further documentation (FOIA # 2019-001087WP). The agency responded with an unprecedented request that we pay copying and search fees, even though we are a public agency which is directly affected by the proposal and we have committed to making the requested information available to the public. We agreed to pay the additional fees. We were informed that documentation would be made available by March 29, which coincidentally is the deadline for comments on the proposal.

We have just learned, by email from the Western Service Center to our counsel (see email attached) that the response to our October 29 request has been further delayed *to a date beyond the expiration of the comment period on the STAR PIRAT TWO procedure.*

**By this letter, we request an extension of time to submit comments on the proposal for 60 days, or for 30 days after the FAA has supplied information in response to our FOIA request, whichever is later.**

As you are undoubtedly aware, the time for a judicial challenge to a final agency action is short and the agency's failure to provide even the most basic information to the public about the proposal has already seriously impeded the ability of the City to provide meaningful comments on the proposal. We believe

P.O. Box 10250  
Palo Alto, CA 94303  
650.329.2477  
650.328.3631 fax

that, absent an extension of time, the City would be justified in seeking an extension of the jurisdictional period under 49 U.S.C. 46110. By extending the comment period, the agency would reduce the risk that potential legal challenges would be further delayed.

There is no doubt that the PIRAT procedure has already generated considerable controversy and threatens to create the kind of controversy which led the FAA to announce its intention to prepare an Environmental Assessment for flight track changes in the vicinity of Burbank Hollywood Airport. See [https://www.faa.gov/nextgen/nextgen\\_near\\_you/community\\_involvement/bur/](https://www.faa.gov/nextgen/nextgen_near_you/community_involvement/bur/). The extension of time that we seek is designed to provide the information to the public which will enable decision makers and the public to understand the impacts of the PIRAT procedure and potentially avoid the overwhelming controversy that occurred in Studio City and Sherman Oaks, California.

### **Comments on the PIRAT STAR TWO**

***Ambiguity of Vectoring's Routes, Altitudes, and Impacts*** The STAR PIRAT TWO Procedure ends at the waypoint ARGGG. Based on the limited information provided, once the procedure terminates, aircraft are vectored via Air Traffic Control. The paths, altitudes, and noise impact of vectored aircraft have not been disclosed by the FAA. Based on existing conditions and experience with past procedural changes, we believe the vectoring of aircraft will increase noise impacts in Palo Alto and neighboring peninsula communities. We request the procedure be amended to increase the altitude of planes flying over Palo Alto and neighboring peninsula communities.

***Impacts of Increased Volume*** The STAR PIRAT TWO replaces a tailored approach that was in limited use as only certain airlines were permitted to fly the procedure. By opening the procedure to more airlines and/or by expanding its use beyond SFO arrivals to also include OAK arrivals the volume of air traffic will increase, thereby increasing the noise impacts on Palo Alto and her neighbors. If the noise impacts have been studied, they have not been disclosed. Until the procedure is amended to decrease noise impacts, we request the publication of the procedure be delayed.

***Environmental Impacts*** The proposed route, and the associated areas most likely to be used in vectoring flights from ARGGG to final approach, would likely direct aircraft over noise-sensitive areas, several wildlife refuges and water storage areas, historic areas, and minority and low-income populations. We draw your attention to the specific obligations of the FAA to consider impacts over such areas even if the agency believes that it has adequate legal justification to use a CatEx. See FAA Order 1050.1F § 5-3 in particular. The documentation provided thus far does not address the procedure's environmental impacts. We request the procedure be delayed until these environmental impacts are addressed.

***Inadequate Use of New Technologies*** We urge the FAA to creatively partner with airports in the San Francisco Bay Area Metroplex to leverage new technologies to develop improved procedures as part of its Next-Gen journey. Leveraging SFO's Ground-Based Augmentation System (GBAS) is a key starting point. As you know, SFO is linking two satellite-based approach technologies – Required Navigation Performance (RNP) and a Global Navigation Satellite System (GNSS) Landing System (GLS) – to improve from the approach tools invented 85 years ago, but improvements can only be gained by this technology if the FAA is willing to consider procedures that take advantage of it. The STAR PIRAT TWO is an opportunity to leverage the new technology to create a procedure that decreases noise impacts. We request the FAA to begin working with SFO to integrate the capabilities of the GBAS system with the STAR PIRAT TWO.

### **Inadequate Disclosure of Impacts**

We do not believe the FAA has adequately disclosed impacts of the STAR PIRAT TWO under its existing orders and policy statements. We have been advised that the manner in which STAR PIRAT TWO has been publicly disclosed violates standard agency practice for enhanced community involvement that has been adopted in the wake of the *Phoenix v. Huerta* decision.

Thank you for your attention to this matter.

Sincerely,



Eric Filseth, Mayor  
City of Palo Alto

cc: [Sent via email to 9-AMC-Aerochart@faa.gov](mailto:9-AMC-Aerochart@faa.gov)

Ms. Teri Bristol, Chief Operating Officer, Air Traffic Organization  
Ms. Jodi McCarthy, Vice President, Mission Support Services  
Mr. Dennis Roberts, FAA Western-Pacific Regional Administrator  
Ms. Faviola Garcia, Acting Deputy Regional Administrator  
Ms. Kimberly Stover, Director, Air Traffic Operations, FAA Western Services Area, AJTW  
Mr. Kevin Stewart, Acting FAA Aeronautical Information Services Manager  
FAA Western Services Area Air Traffic Organization Manager  
Staff, FAA Air Traffic Organization  
Jacob Powers, Air Traffic Organization Western Service Area FOIA office  
Hon. Dianne Feinstein, U.S. Senate  
Hon. Kamala D. Harris, U.S. Senate  
Hon. Anna G. Eshoo, U.S. House of Representatives  
Palo Alto City Council  
Edward Shikada, Palo Alto City Manager  
Molly Stump, Palo Alto City Attorney  
Peter J. Kirsch, Kaplan Kirsch Rockwell

**Subject:** Follow up on PIRAT

**Date:** Wednesday, April 10, 2019 at 4:10:51 PM Pacific Daylight Time

**From:** Darlene Yaplee

**To:** Andi Jordan

**CC:** Darlene E. Yaplee

Greetings Andi,

Thank you again for your effort in standing up the new RT.

I spoke at the March 27th SC/SC Roundtable and advocated that the FAA provide similar information on PIRAT as requested for LOUPE FIVE. My understanding was that you commented that staff (yourself) could and would make the request. I wanted to check that my understanding is correct.

I will also send a separate email to you to send to the RT members regarding a good example of how to engage Congressional members as a RT.

Kind regards,  
Darlene Yaplee

**Subject:** SC/SC Roundtable - sharing a RT Best Practice  
**Date:** Wednesday, April 10, 2019 at 8:05:41 PM Pacific Daylight Time  
**From:** Darlene Yaplee  
**To:** Andi Jordan  
**CC:** Darlene E. Yaplee  
**Attachments:** Rep Speier Letter on NIITE-HUSSH 032819.pdf

Ms. Jordan,

I am sharing this information in the spirit of best practices to show how Congressional Representatives can actively support the work of a Roundtable.

Attached is a recent letter that Representative Speier sent to the FAA Acting Administrator on March 28, 2019. The letter was made public at the April 3 SFO Roundtable meeting, and seems to have been effective given that the FAA announced at the SFO Roundtable meeting that they have agreed to work on designing the requested change.

As mentioned in the attached letter, Representative Speier hosted a meeting with airline representatives on 10/23/2018. In addition, the FAA Western-Pacific Regional Administrator Raquel Girvin hosted a meeting with Offices of Congressional Reps (including the Offices of Representatives Eshoo and Panetta) on 2/22/2019 (FAA slides on the NITTE-HUSSCH SIDs: Steps Forward were part of that meeting).

Please ensure that the above information is distributed to members of the Santa Clara/Santa Cruz Roundtable as well as others who might be interested.

Regards,  
Darlene Yaplee  
Palo Alto

JACKIE SPEIER  
14TH DISTRICT, CALIFORNIA

2465 RAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515-0514  
(202) 225-3531  
FAX: (202) 226-4183

155 BOVET ROAD, SUITE 780  
SAN MATEO, CA 94402  
(650) 342-0300  
FAX: (650) 375-8270

WWW.SPEIER.HOUSE.GOV  
WWW.FACEBOOK.COM/JACKIESPEIER  
WWW.TWITTER.COM/REPSPEIER

Congress of the United States  
House of Representatives  
Washington, DC 20515-0514

COMMITTEE ON ARMED SERVICES  
SUBCOMMITTEES  
RANKING MEMBER, MILITARY PERSONNEL  
EMERGING THREATS  
PERMANENT SELECT COMMITTEE  
ON INTELLIGENCE  
SUBCOMMITTEES:  
EMERGING THREATS  
NSA AND CYBERSECURITY

Senior Whip

March 28, 2019

Daniel K. Elwell, Acting Administrator  
Federal Aviation Administration  
800 Independence Avenue SW  
Washington D.C. 20591

Via Email

Re: NIITE/HUSSH Departures Southbound Transitions

Dear Acting Administrator Elwell:

On November 29, 2018, I wrote to you requesting that you re-consider your decision to unilaterally halt the implementation of the SFO NIITE Departure/Southbound Transition.

I have received no response from you. And, yes, I am fully aware that the government had a shutdown that affected the FAA. However, you had more than 3 weeks before the shutdown and more than 2 months since the shutdown to pen a response to my letter.

As you know, the FAA continues to insist on three ridiculous pre-conditions that must be met before the FAA will resume implementation of the NIITE Southbound. The FAA is now insisting that somehow the SFO Roundtable must provide the data to answer these three pre-conditions:

1. *Congestion and delays* and 2. *Additional miles to be flown*

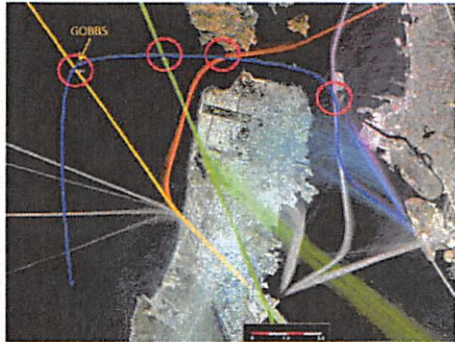
These two pre-conditions cannot be answered by the SFO Roundtable. No voting member of the SFO Roundtable is a representative of the airline industry and the Roundtable has no mechanism to obtain such input from industry. However, as you are well aware, I hosted a meeting on October 23, 2018 to discuss these two NIITE/HUSSH Southbound pre-conditions with airline industry representatives. (This is the meeting at which no FAA staffer attended after your office reneged on a commitment made by a senior FAA manager for FAA staff to attend.) I would be happy to share with you the positive discussions from that meeting.

### 3. "Noise-shifting"

This precondition is mind-boggling. How can the SFO Roundtable undertake outreach to other communities if there is no draft flight procedure to present to a community? Clearly, without details such as the exact path to be flown and the minimum altitudes to be maintained, no fully informed outreach can be made. But if the FAA resumes the PBN implementation process for the NIITE Southbound, such outreach is a natural part of the regular FAA PBN and environmental processes.

On February 22, 2019, Western Pacific Regional Administrator Raquel Girvin hosted a meeting for a designee from my office as well as the offices of Representatives Eshoo and Panetta. At that meeting, the FAA Regional Administrator presented a PowerPoint entitled *SFO Roundtable NIITE-HUSSH SIDs: Steps Forward*.

## NIITE/HUSSH SIDs – steps forward



- After the SFO Roundtable has fully discussed, vetted, and formally agreed upon the recommendation, it should be assigned to a "Technical Working Group"
- The Technical Working Group should include individuals from the OAK Noise Forum, and/or OAK Airport, as the recommendation will affect both SFO and OAK airports
- The SFO Roundtable Chairperson will then formally request FAA participation through the AWP Regional Administrator's Office

STEP 1

STEP 2

STEP 3

November 29, 2018

Federal Aviation Administration

That PowerPoint specified that after the SFO Roundtable has fully discussed, vetted and formally agreed upon the NIITE/HUSSH recommendations, it should be assigned to a Technical Working Group. <sup>FAA</sup> Thereafter, working with the OAK Noise Forum (to coordinate with the OAK HUSSH Southbound), the SFO Roundtable would make a formal request to the FAA, and the FAA would assign Subject Matter Experts to work with the SFO Roundtable Technical Working Group on technical aspects of the NIITE/HUSSH Southbound to determine operational and environmental feasibility.

I'm pleased to inform you that, pursuant to Step 1 of your PowerPoint above, the SFO Roundtable has fully discussed, vetted and formally agreed upon the NIITE Southbound recommendation.



At the August 3, 2016 at a noticed public SFO Roundtable meeting, FAA OSG staffers Mindy Wright and Steve Karnes presented a PowerPoint briefing on several proposed Roundtable recommendations, including the NIITE South.

#### 4. Create a New South Transition for the NIITE SID



On November 2, 2016, the SFO Roundtable held their noticed, public regular meeting which was open to the public for comment. At that meeting, the **SFO Roundtable voted unanimously to recommend Recommendation #19 NIITE HUSSH** as follows:

19	NIITE HUSSH	WSC	LT	<p><b>NIITE/HUSSH SOUTH NIGHTTIME HOURS APPLICABLE TO SFO AND OAK FLIGHTS</b></p> <p>Create a south transition for the NIITE that keeps traffic over the Bay and ocean until a high altitude is attained.</p> <p>The south transition to the NIITE should also include applicability of that transition to the OAK HUSSH.</p>	<p>Since the NIITE has a transition for westbound traffic to GOBBS waypoint, a southbound transition could follow a track using the PYE 135° radial (which defines GOBBS) from GOBBS to the PORTE waypoint. Some have suggested that the track should remain offshore for some distance beyond PORTE which could be done using a portion of the OFFSHORE ONE departure, with aircraft flying to the WAMMY waypoint in the ocean, or a similarly-located waypoint that is offshore, well clear of the coastline.</p>
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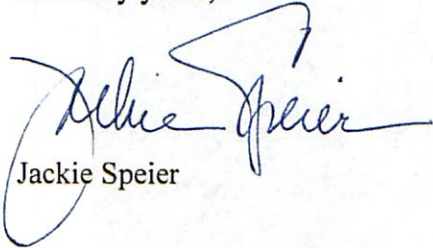
Also during 2016, on a parallel course with the SFO Roundtable, the Select Committee on South Bay Arrivals held public hearings on the NIITE Departure Southbound Transition. At those meetings, the FAA presented briefings on the NIITE departure and the Select Committee unanimously recommended the implementation of the NIITE/HUSSH Southbound Transition at their final meeting on November 16, 2016.

With regard to STEP 2 of your PowerPoint, on March 18, 2018, the SFO Roundtable Technical Working Group at a noticed public meeting has initially considered the NIITE/HUSSH Southbound Departures.

So, I submit that, pursuant to your PowerPoint, that the SFO Roundtable is now in a position to invite representatives of the OAK Noise Forum to join them at the Technical Working Group to coordinate NIITE with HUSSH (STEP 2) and then the SFO Roundtable Chairperson will formally request FAA participation through the SWP Regional Administrator's office (STEP 3) to be followed by the SFO Roundtable Technical Working Group working collaboratively with FAA-assigned SMEs (Subject Matter Experts) to gather technical data in order to expeditiously proceed to the IFP Gateway with the NIITE/HUSSH Southbound Transition.

As a former member of the SFO Roundtable, representing the then 600,000 residents of San Mateo County, I can tell you that the SFO Roundtable has an important role to play and I urge you to work collaboratively with the SFO Roundtable and the SFO Roundtable Technical Working Group to fulfill the (already deemed feasible) recommendations to implement the NIITE/HUSSH Departures Southbound Transitions.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jackie Speier". The signature is fluid and cursive, with a large loop at the end of the last name.

Jackie Speier

KJS:kw

cc:

Rep. Nancy Pelosi

Rep. Anna Eshoo

Rep. Jimmy Panetta

SFO Airport/Community Roundtable Members

FAA Western Pacific Regional Administrator Raquel Girvin

Ivar Satero, Director, SFO Airport

Captain Brian Quigley, United Airlines VP, SFO Hub

**Subject:** Re: SCSC Roundtable Meeting tomorrow at 1PM and Free Valet Parking  
**Date:** Friday, April 12, 2019 at 2:13:22 PM Pacific Daylight Time  
**From:** Jennifer Landesmann  
**To:** Andi Jordan  
**Attachments:** image001.png

Hi Andi,

The info when meetings are coming up and new website is much appreciated.

Is there an estimate of when the Minutes of the March 27 meeting will be available?

Also - a friendly suggestion to Steve Alverson when doing minutes going forward - if at all possible to have a section (at the beginning or end of the Minutes report) that summarizes "Actions Taken" with a tally of any and all items formally voted on by the roundtable. Over time, it's not simple to keep track of what happened when, and it will be immensely helpful to have the tally/summary done as it is happening, and then it's available for easy reference later on.

Thank you!

Jennifer

On Tue, 26 Mar 2019 at 20:03, Andi Jordan <[andi@citiesassociation.org](mailto:andi@citiesassociation.org)> wrote:

*Reminder that there is a SCSC Roundtable Meeting tomorrow at 1PM at Santa Clara County Government Center, Board of Supervisors Chambers.*

[Agenda is here.](#)

## **FREE VALET PARKING IS AVAILABLE**

*Parking options:* Free valet parking is available at the parking lot at San Pedro and Hedding which is directly across from the entrance near the Chambers.

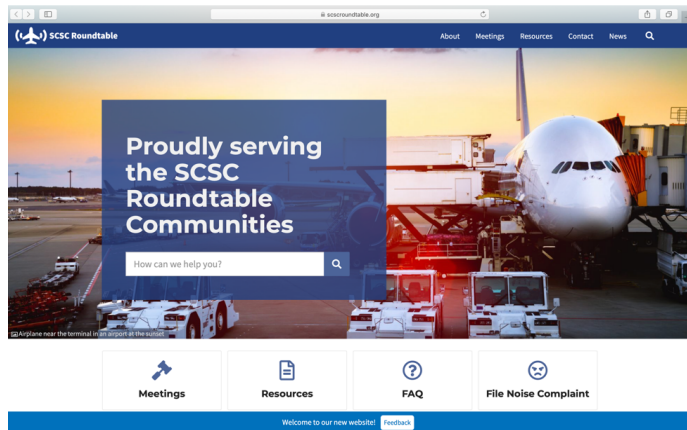
Entrances on Hedding or San Pedro. [Click here for the map.](#)

Public parking garage is also on Hedding across from the Justice Facility.

[Bylaws are available at this link](#) and will be distributed to Roundtable members at the meeting.

Please note that the meeting was reviewed again and changes made to the redline to adequately reflect the motion and vote, CITY member and alternates representatives are elected officials (residents are not allowed to serve as members).

[The website is now live.](#)



Please note that onboarding of content is ongoing.

You may also find the Roundtable on [Twitter](#) and [Facebook](#).

<https://www.facebook.com/SCSCroundtable/>

<https://twitter.com/SCSCroundtable>

Looking forward to seeing many of you tomorrow,

Andi Jordan

Executive Director

Cities Association of Santa Clara County

PO Box 3144

Los Altos, CA 94024

408.766.9534

[LinkedIn](#) | [email](#) | [Twitter](#) | [website](#)

**Subject:** FW: Input about SC/SC Roundtable  
**Date:** Friday, April 12, 2019 at 5:04:00 PM Pacific Daylight Time  
**From:** Carlos Palacios  
**To:** Andi Jordan

I am passing along this input from a resident.

**Carlos J. Palacios | County Administrative Officer**

County of Santa Cruz  
701 Ocean Street, Room 520  
Santa Cruz, CA 95060  
Main: (831) 454-2100

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**From:** Jane Manning <jmanning65@ymail.com>  
**Sent:** Friday, April 12, 2019 4:50 PM  
**To:** Carlos Palacios <Carlos.Palacios@santacruzcounty.us>  
**Cc:** Jane Manning <jmanning65@ymail.com>  
**Subject:** Input about SC/SC Roundtable

To: Carlos Palacios, Santa Cruz County Chief Administrative Officer

From: Jane Manning  
16625 Skyline Boulevard, Los Gatos, CA 95033 (in Santa Cruz County)  
[jmanning65@ymail.com](mailto:jmanning65@ymail.com)

April 11, 2019

Dear Mr. Palacios,

I am contacting you about potential Work Plan items for the Santa Clara-Santa Cruz County Airport-Community Round Table. I've been attending the meetings, as well as those of the SFO Round Table. I'm new to the process, but support solutions that are equitable. Our household is located at the intersection of three major procedures and is severely negatively affected by noise to the point of health disturbance. These three procedures, BRIXX arrivals to San Jose, SERFR arrivals into SFO and SFO departures using the SSTIK-CISKO transition, amount to at least 30,000 over-flights/year\*.

I respectfully would like you to consider adding two topics to the Work Plan of the new RoundTable:

1. Pursue with the FAA the diversion of southbound SFO departure traffic to out over the Pacific Ocean. Specifically, for example, divert some SSTIK departure traffic to stay over the ocean rather than flying across/along the Santa Cruz Mountains. To clarify, after flights depart SFO, they pass from the SSTIK waypoint located over the SF Bay and travel across the SF peninsula to the PORTE waypoint located off Half Moon Bay harbor. From there, flights fan out among five south-ward transitions. One of these, YYUNG, stays over the Pacific Ocean and flies south; the other four transitions travel back across the peninsula toward the south/southeast. One of these four transitions, CISKO, feeds most of the traffic from SFO to S. California. Traffic to LAX alone is about 15,000 flights/year\*. CISKO flies quite a distance along the ridge of the Santa Cruz Mountains. Planes are in full throttle as they climb and the noise travels far and long in the open Mountains. We had a noise engineer measure it at over 55 dbA. The SFO Round Table has been trying to get the FAA to keep SSTIK traffic from crossing the peninsula and to stay over the Ocean, specifically asking them to reinstate old routes (eg., OFFSHORE). The FAA said at the most recent SFO RT meeting (April 3) that the old routes conflict with Oakland take-off procedures. However, no one has considered the following idea: avoid the CISKO transition in favor of the existing YYUNG transition for southbound traffic. If this were done,

cross-peninsula would go way down, as peninsula activists have requested. The only drawback is that SF and Pacifica would not get relief. However, there are many other ideas circulating for traffic closer to SFO. Using YYUNG would bring a lot of relief from noise in San Mateo, Santa Clara and Santa Cruz Counties, as well as to everyone recreating in the Santa Cruz Mountains. It would remove at least 15,000 flights/year because SSTIK-CISKO serves not only LAX, but also San Diego, Long Beach, Orange County, Ontario and tons of other southern airports. This idea has a good chance of success because YYUNG is an existing procedure. My hope is that you: a) add a Round Table work item to reduce SSTIK departure traffic over the Santa Cruz Mountains and b) request that both Round Tables view the problem of cross-peninsula traffic and traffic along the Santa Cruz Mountains as tandem problems with potentially overlapping solutions.

2. The other work plan request I have is: When the FAA finally initiates a project to work on SERFR, as recommended by the Select Committee, can the new Round Table fully engage with the SFO Round Table so that the different areas are not working at cross purposes and so that ideas that bring overlapping solutions take priority at both Round Tables? No one wants to see either Round Table emerge from hard-fought work with the FAA with solutions that could have also assisted other areas of the region. It would be tragic if solutions generated by the SFO RT-FAA cooperation missed opportunities to also address the severe noise problems in the southern area of the region as well. For example, the FAA just agreed to engage with the SFO RT on a Select Committee recommendation about the NIITE procedure. There is the potential that with some tweaks, solutions could include reduction of nighttime traffic southward that would affect the Santa Cruz Mountains in the way I discussed above. If planes move from NIITE to SSTIK, for example, then the FAA could potentially consider using exclusively the YYUNG transition, which would reduce noise at least part of the time. As I described, my household can't take much more. I believe the best solutions can come from a higher level of cooperation across the region. That is what I am hoping for with the Santa Clara-Santa Cruz County Round Table.

Thank you for your work. I appreciate your time taken to read this letter and the possibility that you could consider my suggestions.

Sincerely,

Jane Manning

\*As of February 2019, cited from Wikipedia and from <https://www.routesonline.com/news/29/breaking-news/282852/exclusive-routes-research-reveals-busiest-routes-in-the-americas/?highlight=busiest>